

### REMARKS

Claims 8, 9 and 12-17 and 19-31 are pending in this application. Claim 8 has been amended. It is respectfully submitted that no new matter has been added.

Claims 8, 9, 12, and 14-16 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Okamoto et al. (US 20030067570) in view of Baek (US 6,580,480) and further in view of Sakamoto (US 7,015,996).

Amended claim 8 recites, *inter alia*, an organic insulating layer formed on the switching device, a pixel electrode formed on the organic insulating layer, and a reflecting plate formed on the pixel electrode. Applicants disclose an organic insulating layer (144) formed on the switching device (111), a pixel electrode (150) formed on the organic insulating layer (144), and a reflecting plate (160) formed on the pixel electrode (150). See e.g., FIG. 2 of the present application. Applicants respectfully submit that neither Okamoto, Baek, Sakamoto, nor any combination thereof teaches or suggests the above-claimed features.

Okamoto discloses an insulating layer (25), a switching device (21), a driving electrode (19) and a pixel electrode (20). See e.g., FIG. 24 of Okamoto. However, Okamoto does not disclose an organic insulating layer formed on the switching device, a pixel electrode formed on the organic insulating layer, and a reflecting plate formed on the pixel electrode.

Baek discloses a transparent electrode (120) and a reflective electrode (140). See e.g., FIG. 3 of Baek. However, Baek does not disclose an organic insulating layer

formed on the switching device, a pixel electrode formed on the organic insulating layer, and a reflecting plate formed on the pixel electrode.

Sakamoto discloses a TFT substrate (11), a transparent electrode (19), and a reflective electrode (18). See e.g., FIG. 9 of Sakamoto. However, Sakamoto does not disclose an organic insulating layer formed on the switching device, a pixel electrode formed on the organic insulating layer, and a reflecting plate formed on the pixel electrode.

Accordingly, claim 8 is patentable over Okamoto in view of Baek and further in view of Sakamoto. Claims 9, 12 and 14-16 depend from claim 8. Thus, these dependent claims are also allowable for at least the same reasons provide above for the base claim. Accordingly, withdrawal of the claim rejection is respectfully requested.

Claim 13 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Okamoto, Baek, and Sakamoto in view of Ha et al. (US 6704081).

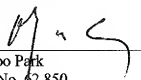
Claim 13 depends from claim 8. As above, neither Okamoto, Baek, Sakamoto, nor any combination thereof teaches or suggests a lower substrate having a switching device, an organic insulating layer formed on the switching device in the first area, a pixel electrode formed on the organic insulating layer and connected to a drain electrode of the switching device. Ha does not cure the deficiency in this regard. Accordingly, claim 13 is allowable over Okamoto in view of Sakamoto and further in view of Ha. As such, withdrawal of the claim rejection is respectfully requested.

Claims 26 and 27 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Okamoto, Baek and Sakamoto in view of Nakashima (US7015996).

Claims 26 and 27 depend from claim 8. As stated above, neither Okamoto, Baek, Sakamoto, nor any combination thereof teaches or suggests a lower substrate having a switching device, an organic insulating layer formed on the switching device in the first area, a pixel electrode formed on the organic insulating layer and connected to a drain electrode of the switching device. Nakashima does not cure the deficiency in this regard. Accordingly, claim 26 and 27 are allowable over Okamoto in view of Baek and Sakamoto and further in view of Nakashima. As such, withdrawal of the claim rejection is respectfully requested.

For the foregoing reasons, the present application is believed to be in condition for allowance. The Examiner's early and favorable action is respectfully requested. The Examiner is invited to contact the undersigned if he has any questions or comments in this matter.

Respectfully submitted,



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